

The Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF C.D.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, C.D., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I have chosen to submit this declaration using only my initials, and my child's
5 initials, because I am fearful that the government could retaliate against me or my child, or that
6 individuals emboldened by recent actions of the Federal Government would target my family
7 for speaking out.

8 3. I am a single parent to three children, my daughter L.O. (15), her 12-year-old
9 sister, and four-year-old brother. We live in a rural area of Washington State.

10 4. L.O. is in her first year of high school. She is a transgender girl, meaning that her
11 gender identity is female, though she was assigned a male gender at birth.

12 5. My first awareness of L.O.'s transgender identity came when she was three or
13 four years old. At that time, she would express to me, "Mom, I want to be girl." In the years that
14 followed, she wouldn't play with anything masculine; she liked dolls, and playing dress-up with
15 dresses. By then her younger sister had dresses, and L.O. tried to wear them even though they
16 wouldn't fit. At the time I just let it be, thinking it could just be a phase that L.O. would grow
17 out of. I personally had very little exposure to any queer community. We lived in a rural,
18 conservative area. I believe I had ever known only one queer person at that time.

19 6. Around age four, L.O.'s talk around gender became disturbing. She would tell
20 me, "I don't like my penis. I want to cut it off." When she said, "I wish I was a girl," her tone
21 was more emotional now, more persistent and insistent. She also began to experience frequent
22 emotional outbursts. I was forced to pay attention—I understood that the issue was more serious,
23 and not simply a phase.

24 7. At this point, I got L.O. connected with therapy. Even though we lived in a
25 conservative town, there was a therapist who advertised that she was a transgender support
26 therapist. In the end L.O. went to this therapist for couple of years. She was a wonderful ally and

1 resource for our family. In the early sessions the therapist suggested that L.O. might be
2 transgender, and suffering from gender dysphoria. In therapy we had a conversation about “the
3 different ways we can feel about ourselves,” using language appropriate for a four-year-old. L.O.
4 felt very heard, even at that young age. After that day, L.O. wanted to use she/her pronouns and
5 be called by a new name. She asked me to help her compile a list of names, and she chose the
6 name she liked best from that list.

7 8. L.O. has been in therapy continuously since that time, with a few different
8 therapists. All have been helpful for her, and for our family. She received a formal diagnosis of
9 gender dysphoria in approximately 2014, and a referral for medical gender-affirming care. In
10 approximately 2020, she began seeing specialists at a gender clinic in the Seattle area for gender-
11 affirming care. In addition to her therapist’s assessment, at the gender clinic she was fully
12 assessed and evaluated for potential use of puberty blockers and hormones. These tests included
13 bone density scans and bloodwork to gauge baseline hormone levels.

14 9. L.O. began using a puberty blocker in 2023 around the age of 13. The following
15 year, she began using estrogen therapy. Since then, L.O. has discussed her desire for surgical
16 gender-affirming care. That prospect is in the future, but I support my daughter. If she seeks
17 surgical care as she grows older, I will help her achieve that.

18 10. Gender-affirming care has had inestimable benefits for my daughter. When L.O.
19 was little, and I reflected her need for gender affirmation, L.O. was able to live as herself. When
20 she heard her correct name and pronouns, when for the first time she was not expected to live as
21 a male child, so many of her behavioral issues cleared up. It was like night and day, the way she
22 improved and became calmer and happier. It was clear to me then that L.O. needed to be seen
23 and accepted. When she received medical gender-affirming care in the form of puberty blockers,
24 she bloomed. It was clear L.O. did not want to become a boy, and experience changes of
25 masculinization from puberty. Thankfully we were able to prevent that. With the addition of
26

1 estrogen therapy, L.O.'s happiness and security has increased. I am certain that gender-affirming
2 care has been lifesaving for L.O.

3 11. This year L.O. entered a public high school. She attends school in person part
4 time, and the remainder online. She loves to read, make art, and take photos. My daughter is a
5 foodie. She likes to eat out, and try different kinds of food. We like to get lattes together. She is
6 interested in fantasy video games and anime. She is an intelligent, strong, kind, heartfelt, and
7 compassionate young woman. I am proud of her, and I love her.

8 12. Today L.O. passes as a girl. She has chosen not to be out as a transgender girl
9 because of our national culture of hostility towards transgender people. I understand this, and I
10 recognize that it may help to keep her safe. But it causes grief in my heart. L.O. is only 15 years
11 old, and should not have to shoulder such a burden. L.O. has trouble reconciling being
12 transgender in a society filled with hatred and prejudice. She experiences panic, anxiety, and
13 discomfort. We have a close, supportive family. We value the sweet and protective life we've
14 built so far. But our life feels very different today because of the Executive Order and the anti-
15 transgender climate fostered by the Federal Government. We feel unsafe, and scared. After
16 having supported a healthy, thriving life for my daughter, after giving her love and acceptance,
17 it's difficult to feel that's being taken away from us.

18 13. L.O. knows about the Executive Order. It is very upsetting to her. In fact, the past
19 year has been a process of upset for her. To know that the U.S. might have an incoming
20 presidential administration hostile to the very existence of my young daughter, and then to see
21 the Executive Order come out, it has all been extremely scary for L.O. She no longer feels safe.
22 Her life has been turned upside down. From her endocrinologist, we learned that our insurance
23 might not continue to cover gender-affirming care. L.O.'s gender clinic is looking to other
24 funding sources. There is so much uncertainty. At a minimum, we know that L.O.'s gender clinic
25 is paring down its gender-affirming care. This is heartbreaking, for us, and for so many other
26 families.


1 14. We are faced with an unthinkable question: do we need to leave the country?
 2 Taking such a step would be extraordinarily difficult for me as single parent. We have limited
 3 resources. However, I would do anything to protect my daughter. I have talked to other like-
 4 minded families, to see what community support exists for us. I have explored international
 5 asylum programs. I have gotten our passports in order. We should never, ever, have to think of
 6 such things in the U.S. But we do.

7 15. If Washington State were not suing to challenge the Executive Order, I would not
 8 be able not sue on my daughter's behalf. The thought is overwhelming, and I lack the required
 9 resources—financial and otherwise. It would be an enormous challenge for me to navigate.
 10 Especially in the current political climate, where I feel unsafe and afraid. My family quite
 11 literally fears violence against us from unknown people, people emboldened by the hateful
 12 rhetoric of the Federal Government. In such circumstances, it is not realistic for us to organize
 13 our own legal challenge.

14 16. What I know is true is that all people of all different kinds deserve love, and
 15 safety, and freedom. My daughter no less than any other person. That truth is what I hold in my
 16 heart, in this new and scary world.

17
 18 I declare under penalty of perjury under the laws of the State of Washington and the
 19 United States of America that the foregoing is true and correct.

20 DATED this 18 day of February 2025.

21
 22 
 23 _____
 C.D.
 Parent of L.O.